

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

**DENNIS BALLARD
DEXTER BROWN
CLARENCE CALVERT
KELVIN CARPENTER
EDDIE DEAN
HUBERT DEAN
ROBERT DEAN, Jr.,
GERRY GAMBLE,
ROBERT GREER
BILAL HAYNES,
RONNIE MOORE
REGIS WASH,
MARCUS WASH,
KENNIE WILLIAMS,**

Plaintiffs,

v.

**WILLIAM J. “JERRY” NOBILE,
JERRY NOBILE FARMS, INC.,
WILLIAM J. “WILL” NOBILE JR.,
WILL NOBILE FARMS, INC.**

Defendants.

Civil Action No. 4:23cv161-DMB-JMV

PLAINTIFFS’ MOTION TO WAIVE *PRO HAC VICE* APPLICATION FEE

Pursuant to Local Uniform Civil Rules for the Northern District of Mississippi and the Southern District of Mississippi Rule 83.1(d)(5), Plaintiffs respectfully request that the Court waive the fees associated with the *pro hac vice* application of attorney Hannah M. Wolf.

Under Local Rule 83.1(d)(5), an applicant to appear *pro hac vice* will not be required to pay the fee established by Local Uniform Civil Rule 83.1(d)(5) if “the applicant will not charge an attorney fee to the client(s) and is . . . employed or associated with a pro bono project or nonprofit legal services organization in a civil case involving the client(s) of such programs[.]”

Ms. Wolf, who seeks to serve as co-counsel for Plaintiffs, is an attorney at Texas RioGrande Legal Aid, Inc. (“TRLA”), a non-profit organization that provides free legal services to, among others, indigent farm workers like Plaintiffs. As a public interest law firm, TRLA represents individuals and groups that are otherwise unable to obtain legal representation.

Plaintiffs therefore respectfully request that this Court grant Plaintiffs’ Motion and waive the fees associated with Ms. Wolf’s *pro hac vice* application. The Application for Admission *Pro Hac Vice* is attached as an exhibit to this Motion.¹

Dated: August 30, 2023

Respectfully submitted,

s/ Robert McDuff

Robert McDuff, MS Bar No. 2532
MISSISSIPPI CENTER FOR JUSTICE
5 Old River Place, Suite 203
Jackson, MS 39202
Telephone: (601) 352-2269
Facsimile: (601) 352-4769
rbm@mscenterforjustice.org

Counsel for Plaintiffs

¹ Plaintiffs file this Motion and the attached Application in this manner at the suggestion of the Clerk's Office.

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing pleading or other papers with the clerk of the court using the ECF system which sent notification to all counsel of record, and I am emailing a copy to Tim Threadgill who is counsel for Defendants.

Submitted this the 30th day of August 2023.

/s/ Robert McDuff

Robert B. McDuff

Counsel for Plaintiffs